

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ONE MEDIA IP LIMITED,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:14-cv-0957
)	
HENRY HADAWAY ORGANISATION,)	Judge Aleta A. Trauger
LTD. et al.,)	Magistrate Judge E. Clifton Knowles
)	
Defendants.)	

**THE HADAWAY DEFENDANTS' MOTION TO GRANT RELIEF FROM DEFAULT
JUDGMENT UNDER RULE 60(b)(4) AND DISMISS UNDER RULE 12(b)(2)**

Pursuant to Federal Rule of Civil Procedure 60(b)(4), Defendants Henry Hadaway Organisation, Ltd., HHO Licensing Ltd., and Henry Hadaway (collectively, the “Hadaway Defendants”) respectfully move the Court to grant them relief from the default judgment entered against them (Dkt. 77), of which they were served with notice on January 27, 2016 (Dkt. 84–86). In addition to the fact that Plaintiff’s claims of infringement are factually baseless and time-barred, like the other Defendants, the Hadaway Defendants are not subject to personal jurisdiction, meaning that the default judgment against them is void and must be set aside.

Further, because the Hadaway Defendants are not subject to personal jurisdiction, they also respectfully move for dismissal pursuant to Federal Rule of Civil Procedure 12(b)(2).

As support for this Motion, the Hadaway Defendants rely on the contemporaneously filed Memorandum in Support of the Hadaway Defendants’ Motion to Grant Relief from Default Judgment Under Rule 60(b)(4) and Dismiss Under Rule 12(b)(2) and the Declarations of Henry Hadaway and Lawrence Abramson, as well as the exhibits thereto.

Dated: April 27, 2016

Respectfully submitted,

/s/ Paige Waldrop Mills

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2016, a true and exact copy of the foregoing has been served on the following via the Court's electronic filing system:

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